



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMK:MSA/MEB
F. #2016R00695

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 3, 2019

By Hand

The Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Jean Boustani, et al.
Criminal Docket No. 18-681 (WFK)

Dear Judge Kuo:

The government respectfully submits this letter to request that the Court order unsealing of a redacted copy of the above-captioned sealed indictment in this case so that a redacted copy of the indictment with information regarding the defendants Jean Boustani, also known as "Jean Boustany," Manuel Chang, Andrew Pearse, Surjan Singh and Detelina Subeva be made publicly available. Boustani was arrested in the Eastern District of New York yesterday, and following that arrest, the Court issued an Order unsealing a redacted indictment with information regarding Boustani. Pursuant to provisional arrest warrant requests from the United States, the defendant Manuel Chang was arrested in South Africa on December 29, 2018, and the defendants Andrew Pearse, Surjan Singh and Detelina Subeva were arrested in the United Kingdom earlier today. Accordingly, the government seeks to unseal a redacted indictment, in the form attached, redacting the names of individuals who have not yet been apprehended. In addition, the government asks to unseal the docket as to these same apprehended defendants.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Matthew S. Amatruda
Mark E. Bini
Assistant U.S. Attorneys
(718) 254-8761 (Bini)

Enclosure